

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

FABRICE TOURRE,

Defendant.

10 Civ. 3229 (BSJ)(MHD)

**STIPULATION AND [PROPOSED] ORDER EXTENDING
THE DEADLINE FOR FOREIGN DISCOVERY**

WHEREAS the Court set a tentative deadline of November 18, 2011, for the completion of foreign discovery; and

WHEREAS the Court extended the deadline for the completion of foreign discovery to February 15, 2012, with the understanding that it would likely be necessary to further extend the deadline for depositions of one or more witnesses pursuant to Hague Convention Letters of Request to the courts of the Federal Republic of Germany; and

WHEREAS the Court extended the deadline for the completion of foreign discovery to May 15, 2012, with the understanding that it would likely be necessary to further extend the deadline for depositions of one or more witnesses pursuant to Hague Convention Letters of Request to the courts of the Federal Republic of Germany; and

WHEREAS the Court extended the deadline for the completion of foreign discovery to June 30, 2012, with the understanding that it would likely be necessary to further extend the deadline for depositions of one or more witnesses pursuant to Hague Convention Letters of Request to the courts of the Federal Republic of Germany; and

WHEREAS the Court extended the deadline for the completion of foreign discovery to September 30, 2012, with the understanding that it would likely be necessary to further extend the deadline for depositions of one or more witnesses pursuant to Hague Convention Letters of Request to the courts of the Federal Republic of Germany; and


WHEREAS the parties have identified six former or current employees of IKB Deutsche Industriebank AG whose depositions remain to be taken, either pursuant to Hague Convention Letters of Request or voluntarily; and

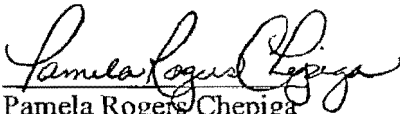
WHEREAS the parties are dependent on the actions of the officials and courts of Germany and the U.S. Consulate with regard to the execution of Letters of Request for depositions and the approval of voluntary depositions in that country;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned that the deadline for the completion of foreign discovery be extended to December 31, 2012.

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned that the parties understand that the extension of the deadline for foreign discovery to December 31, 2012, is intended to enable the taking of the depositions of the above-referenced witnesses, and that it may be necessary to further extend the foreign discovery deadline to complete those depositions or to conduct other discovery that may be necessary in light of the Court's ruling on the SEC's motion filed June 15, 2012 for partial relief from the Court's June 10, 2011 partial dismissal order.

Dated: September 11, 2012


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SO ORDERED: 9/11/12


HON. MICHAEL H. DOLINGER
UNITED STATES MAGISTRATE JUDGE